

**REMARKS**

Claims 1-23 are pending in the present application. By this amendment, claims 1-2, 4-7, and 10-20 are amended, and claims 21-23 are added. Applicants respectfully request reconsideration of the present claims in view of the foregoing amendments and the following remarks.

**I. Claim Rejections**

**Claim Rejections Under 35 U.S.C. §102(e)**

Claims 1-20 are rejected under 35 U.S.C. §102(e) as being anticipated by United States Application Publication No. 2002/0194388 to Boloker et al. (hereinafter “Boloker”). Applicants respectfully traverse this rejection.

**A. Claims 1-10 are allowable.**

As amended, claim 1 recites that a Wireless Application Protocol (WAP) system for delivering voice-based content to a user of a wireless device comprises a WAP Server operative to send instructions to a Voice Portal Node to establish a connection between the wireless device and the Voice Portal Node, in response to receiving the voice-based content request; and the Voice Portal Node operative to place a call to the wireless device, in response to receiving the instructions from the WAP server to establish a connection between the wireless device and the Voice Portal Node.

Boloker does not teach, suggest, or describe a WAP system for delivering voice-based content to a user of a wireless device as recited by claim 1. On the contrary, Boloker describes a system for building multi-modal user interfaces and applications including a WAP phone operative to communicate with various devices including a speech application server and a server over a WAP network and through a wireless gateway. This is not analogous to the system recited by claim 1 because Boloker fails to teach, suggest, or describe that the server is operative to send instructions to the speech application server to establish a connection between the WAP phone and the speech

application server, and that the speech application server is operative to place a call to the WAP phone in response to receiving the instructions from the server. Instead, Boloker describes that the WAP phone can communicate with the speech application server and the server through a wireless gateway, without suggesting that the server is operative to send instructions to the speech application server to establish a connection between the speech application server and the WAP phone, and in response to receiving the instructions, that the speech application server is operative to place a call to the WAP phone.

For at least the reasons given above, Applicants respectfully submit that Boloker does not anticipate Applicants' claimed invention as embodied in amended claim 1. Since claims 2-10 depend from claim 1 and recite further claim features, Applicants respectfully submit that Boloker does not make obvious or anticipate Applicants' claimed invention as embodied in claims 2-10 for at least these reasons. Accordingly, withdrawal of these rejections is respectfully requested.

B. Claims 11-19 are allowable.

As amended, claim 11 recites that a method for delivering voice-based content and text-based content to a Wireless Application Protocol (WAP) device comprises establishing a WAP-based connection between the WAP device and a WAP Server; after establishing the WAP-based connection between the WAP device and the WAP Server, determining whether the voice-based content is requested; if the voice-based content is requested, then establishing a telephonic connection between the WAP device and a Voice Portal Node.

Boloker does not teach, suggest, or describe a method for delivering voice-based content and text-based content to a WAP device as recited by claim 11. In contrast, Boloker describes a method for building multi-modal user interfaces and applications including establishing a communication between a WAP phone and various devices including a speech application server and a server over a WAP network and through a wireless gateway. This is not analogous to the method recited by claim 11 because

Boloker fails to teach, suggest, or describe determining whether voice-based content is requested after establishing a communication between the WAP phone and the server, and if so, then establishing a telephonic connection between the WAP phone and the speech application server. Instead, Boloker teaches establishing a communication between the WAP phone and the speech application server and between the WAP phone and the server, without suggesting determining whether voice-based content is requested after establishing the communication between the WAP phone and the server, and if so, then establishing a telephonic connection between the WAP phone and the speech application server.

For at least the reasons given above, Applicants respectfully submit that Boloker does not anticipate Applicants' claimed invention as embodied in amended claim 11. Since claims 12-19 depend from claim 11 and recite further claim features, Applicants respectfully submit that Boloker does not make obvious or anticipate Applicants' claimed invention as embodied in claims 12-19 for at least these reasons. Accordingly, withdrawal of these rejections is respectfully requested.

C. Claim 20 is allowable.

As amended, claim 20 recites that a Wireless Application Protocol (WAP) system for delivering voice-based content and text-based content to a user of a wireless device comprises a WAP Server operative to send instructions to a Voice Portal Node to establish a connection between the wireless device and the Voice Portal Node, in response to receiving the voice-based content request; and the Voice Portal Node operative to place a call to the directory number of the wireless device, in response to receiving the instructions from the WAP server to establish a connection between the wireless device and the Voice Portal Node.

Boloker does not teach, suggest, or describe a WAP system for delivering voice-based content and text-based content to a user of a wireless device as recited by claim 20. On the contrary, as discussed above, Boloker describes a system for building multi-modal user interfaces and applications including a WAP phone operative to communicate with

various devices including a speech application server and a server over a WAP network and through a wireless gateway. This is not analogous to the system recited by claim 20 because Boloker fails to teach, suggest, or describe that the server is operative to send instructions to the speech application server to establish a connection between the WAP phone and the speech application server and that the speech application server is operative to place a call to the directory number of the WAP phone in response to receiving the instructions from the server. Instead, Boloker describes that the WAP phone can communicate with the speech application server and the server through a wireless gateway, without suggesting that the server is operative to send instructions to the speech application server to establish a connection between the speech application server and the WAP phone, and in response to receiving the instructions, that the speech application server is operative to place a call to the directory number of the WAP phone.

For at least the reasons given above, Applicants respectfully submit that Boloker does not anticipate Applicants' claimed invention as embodied in amended claim 20.

## II. New Claims 21-23

New claims 21-23 are directed to further embodiments of Applicants' claimed invention. Support for new claim 21 may be found at page 8, lines 5-12 of the specification. Support for new claim 22 may be found at page 9, lines 11-24 of the specification and Fig. 1. Support for new claim 23 may be found at page 12, lines 20-25 of the specification.

New claims 21-22 are allowable over the cited references for at least the reasons given above with regards to claim 1, and new claim 23 is allowable over the cited references for at least the reasons given above with regards to claim 11.

Appl. No. 09/894,257  
Am dt. dated July 12, 2005  
Reply to Office Action of April 12, 2005  
Confirmation No. 5051

**CONCLUSION**

For at least these reasons, Applicant asserts that the pending claims 1-23 are in condition for allowance. The Applicants further assert that this response addresses each and every point of the Office Action, and respectfully request that the Examiner pass this application with claims 1-23 to allowance. Should the Examiner have any questions, please contact Applicants' attorney at 404.954.5042.



Respectfully submitted,  
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